

RECEIVED
FEDERAL ELECTION
COMMISSION

Date: July 31, 2013

2013 JUL 31 PM 4: 50

Affidavit To: FEC General Counsel's Office

Re: MUR # 6740

CELA

IN RESPONSE TO KARGER FEC COMPLAINT

I, Chuck Hurley, Treasurer of Leaders for Families Super PAC, do not know of any wrongdoing in this matter, as alleged by Mr. Karger, and urge the FEC to dismiss his complaint as frivolous and without factual support.

Specifically:

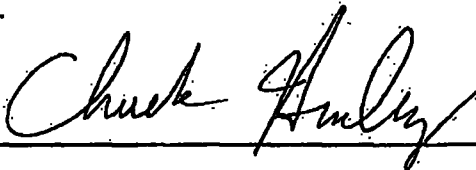
1. I am over 21 years old, a resident of Iowa, have authority to submit this Affidavit on behalf of Leaders for Families Super PAC, and make this Affidavit based on my personal knowledge.
2. Leaders for Families Super PAC was formed in Dec. 2011 to help maximize Robert L. Vander Plaats' endorsement of Rick Santorum for President two weeks prior to the Iowa Caucus vote, by thoroughly broadcasting it to Iowa Caucus voters. Phone calls, television ads, and radio ads were purchased with funds independently secured via Robert L. Vander Plaats' contacts, post-endorsement, and not in coordination with the Santorum for President Campaign.
3. Evidence of no coordination and no "pay for play" is that Candidate Santorum publicly stated that he first learned of the endorsement on Dec. 20, 2011, via a media report at a campaign stop in Pella, Iowa. The endorsement was made public in Urbandale, Iowa, early on Dec. 20, 2011, independent of all candidates and campaigns.
4. Further, no one with Leaders for Families Super PAC had any discussions with, or coordinated funding or any other campaign activity with, the

Santorum for President Campaign, or any other prohibited person or entity. We were fully aware of the coordination prohibitions, and were scrupulous in abiding by them throughout the campaign cycle. All fundraising for Leaders for Families Super PAC was done by Robert L. Vander Plaats, independent of the Santorum for President Campaign, and no lists were sold, given, or shared in any way with, or by, the Santorum for President Campaign.

5. Mr. Karger alleges that use of the Bopp Law Firm by Leaders for Families Super PAC shows that "NOM's fingerprints [are] all over it." I have known and used the Bopp Law Firm since 2004, long before NOM existed. I knew the firm's area of expertise, and hired them after agreeing to their fee structure for this matter.

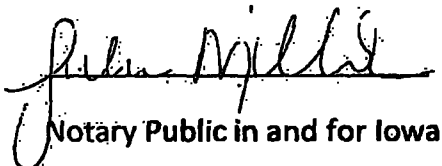
FURTHER AFFIANT SAITH NOT.

I declare and affirm under penalty of perjury that the statements made herein are true and correct to the best of my knowledge, information and belief.



Chuck Hurley, Treasurer, Leaders for Families Super PAC

Sworn to and subscribed before me this 31st day of July, 2013.



Notary Public in and for Iowa

